

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION

No. 1:19-md-2875-RBK  
Hon. Robert Kugler  
Hon. Joel Schneider

**DECLARATION OF CONSILIO**

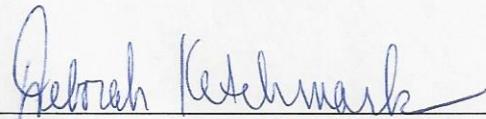
I, Deborah Ketchmark, declare as follows:

1. I am a Director with the Review Solutions department with the company Consilio, which has been retained by Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, Actavis Pharma, Inc., and Arrow Pharm (Malta) Ltd. (collectively, “the Teva Defendants”) in the above-captioned matter.
2. Consilio applied the final set of agreed search terms to the existing custodial data for 17 of the Teva Defendants’ custodians, which, after deduplication and applying email threading, yielded approximately 2.7 million documents.
3. Consilio estimates that applying these search terms across the entire set of approximately 8 million documents in the custodial files of the 36 Court-approved custodians in the database will increase this number of hits to approximately 3.7 million documents, once deduplication and email threading are applied.
4. At the request of the Teva Defendants’ counsel, Consilio provided an estimate of the time required and cost associated with a linear review of this estimated number of documents, and concluded that based on an anticipated review population of 3.7 million documents to

review from the search hits and families for the 36 custodians, the estimated cost of review is \$6,160,000.

5. This estimate included (1) \$4,600,000 for first line review analysis; (2) \$1,110,000 for redactions extrapolating from the current observation of 6% redaction rate of reviewed documents encountered in the review thus far; and (3) \$450,000 for privilege log and redaction work extrapolating from the current observation of 15% of documents requiring privilege review and the assumption that 10% of documents will require logging and/or redactions.
6. Assuming Teva employed 35 reviewers for 40 hours per week, it would take 30 months to complete first level review of this volume of documents.
7. Assuming an increase in size of the team to 100 first level reviewers working 40 hours per week, it would take 11 months to complete first level review.
8. Consilio recommends the use of Continuous Multimodal Learning (“CMLL”) as a best practice in large e-discovery cases.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.



July 14, 2020

Name (Signature)

Executed on

Deborah Ketchmark, Director Review Solutions

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Name (Printed)